

GREENBERG TRAURIG, LLP  
10845 Griffith Peak Drive, Suite 600, Las Vegas, Nevada 89135,  
Telephone: (702) 792-3773 / Facsimile: (702) 792-9002

MARK G. TRATOS, ESQ.  
Nevada Bar No. 01086  
BETHANY L. RABE, ESQ.  
Nevada Bar No. 11691  
**GREENBERG TRAURIG, LLP**  
10845 Griffith Peak Drive  
Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
Email: tratosm@gtlaw.com  
rabeb@gtlaw.com  
*Counsel for Defendants*

JENEVIEVE J. MAERKER, ESQ.\*  
Massachusetts Bar No. 670266  
Jenevieve.Maerker@finnegan.com  
DANNY AWDEH, ESQ.\*  
DC Bar No. 499124  
Danny.Awdeh@finnegan.com  
YOONHEE KIM, ESQ.\*  
DC Bar No. 1033804  
Yoonhee.Kim@finnegan.com  
PATRICK J. RODGERS, ESQ.\*  
\*Pro hac vice application forthcoming  
DC Bar No. 1644022  
Patrick.Rodgers@finnegan.com  
**FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER LLP**  
901 New York Avenue NW  
Washington, DC 20001  
Telephone: (202) 408-4000  
Facsimile: (202) 408-4400  
*Counsel for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**TEAMLAB, INC.**, a Japanese corporation,  
  
Plaintiff,  
  
v.  
  
**ARTE MUSEUM LV, LLC**, a Delaware  
limited liability company; **D'STRICT  
HOLDINGS INC.**, a Delaware corporation,  
and **D'STRICT KOREA INC.**, a Korean  
Corporation,  
  
Defendants.

CASE NO. 2:23-cv-01956-JAD-DJA

**STIPULATION AND PROPOSED  
ORDER TO WAIVE SERVICE ON  
FOREIGN DEFENDANT AND  
EXTEND TIME TO RESPOND TO  
COMPLAINT  
(FIRST REQUEST)**

Plaintiff TEAMLAB, INC., a Japanese corporation, and Defendants ARTE  
MUSEUM LV, LLC, a Delaware limited liability company, D'STRICT HOLDINGS INC.,  
a Delaware corporation, and D'STRICT KOREA INC., a Korean Corporation (collectively,  
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“Defendants”), by and through their respective counsel, and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate and agree as follows:

WHEREAS, Plaintiff served Defendant Arte Museum LV on November 27, 2023, and its deadline to respond to the complaint is currently December 18, 2023;

WHEREAS, Plaintiff served Defendant D’s strict Holdings on November 28, 2023, and its deadline to respond to the complaint is currently December 19, 2023;

WHEREAS, Defendant D’s strict Korea, a Korean company, has not yet been served;

WHEREAS, D’s strict Korea has agreed to waive service under the Hague Convention<sup>1</sup>;

WHEREAS, D’s strict Korea, as a foreign entity, would normally have ninety days to respond to a complaint after the waiver-of-service request was sent to it, *see* Fed. R. Civ. P. 4(d)(3);

WHEREAS, the waiver-of-service request was sent to D’s strict Korea on December 15, 2023, and its deadline to respond is therefore currently March 14, 2024;

WHEREAS, D’s strict Korea has agreed to shorten its response deadline to March 4, 2024 provided that D’s strict Holdings and Arte Museum LV would likewise respond by March 4, 2024. Plaintiff is agreeable to this schedule;

WHEREAS, aligning Defendants’ response deadlines will ensure consistency and efficiency and will shorten the pleading stage for this proceeding;

WHEREAS, additionally, counsel for Defendants was just retained on December 13, and an extension of time to respond will permit Defendants to more fully evaluate and respond to the complaint, especially given limited availability during the holiday season and coordination with party representatives overseas;

WHEREAS, the Court has not entered a Case Management and Scheduling Order, and consequently there are no deadlines set in this case that will be affected by the proposed reasonable extension sought in this stipulation;

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<sup>1</sup> D’s strict Korea reserves all rights and defenses, including as to jurisdiction and venue, but waives any objection to the absence of a summons or of service.

1 NOW, THEREFORE, in consideration of the foregoing, the parties hereby  
2 STIPULATE and AGREE that the deadline for each Defendant to respond to the complaint  
3 is March 4, 2024.

4 The parties represent this stipulation is made in good faith and not for the purposes  
5 of delay. This is the first request to extend time to respond to the complaint.

6 **IT IS SO STIPULATED.**

7 Dated this 15<sup>th</sup> day of December, 2023.

Dated this 15<sup>th</sup> day of December, 2023.

8 GREENBERG TRAURIG, LLP

LEWIS ROCA ROTHBERGER  
CHRISTIE LLP

9 /s/ Bethany L. Rabe

/s/ Eric N. Kohli

10 MARK G. TRATOS (NV BAR 1086)  
11 BETHANY L. RABE (NV BAR 11691)  
12 10845 Griffith Peak Drive, Suite 600  
13 Las Vegas, Nevada 89135  
14 *Attorneys for Defendants*

ERIC N. KOHLI (NV BAR 15763)  
3993 Howard Hughes Pkwy Ste. 600  
Las Vegas, NV 89169  
*Attorneys for Plaintiff*

15 **IT IS SO ORDERED.**

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17 DANIEL J. ALBREGTS  
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: December 18, 2023  
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